

# EXHIBIT J



1900 K Street, NW  
Washington, DC 20006-1110  
+1 202 261 3300 Main  
+1 202 261 3333 Fax  
www.dechert.com

---

ALEXANDRE DE GRAMONT

alexandre.degramont@dechert.com  
+1 202 261 3320 Direct  
+1 202 261 3082 Fax

July 10, 2023

**VIA EMAIL AND FEDEX**

Jason L. Carter, Esq.  
General Counsel, Chief Compliance Officer  
& Vice President of Legal Affairs  
CHICAGO STATE UNIVERSITY  
Office of Legal Affairs  
Cook Administrative Building, Suite 218  
9501 S. King Drive  
Chicago, IL 60628  
Email: Jcarte40@csu.edu

**Re: CSU Diplomas for Mr. Bola A. Tinubu**

Dear Mr. Carter:

My law firm represents Mr. Atiku Abubakar, who was the candidate of Nigeria's principal opposition party (the Peoples' Democratic Party) in the February 2023 presidential elections. The conduct and results of the presidential elections are currently the subject of legal proceedings in the Nigerian courts (the "**Nigerian proceedings**"), including proceedings brought by our client.

Questions have been raised in the Nigerian proceedings about the authenticity of certain documents that purport to be records from Chicago State University ("**CSU**"), concerning Mr. Bola A. Tinubu, who was declared the winner of the February 2023 presidential elections. Of relevance here, there are two very different documents that purport to be the CSU diploma conferring a B.S. in Business and Administration on Mr. Tinubu in 1979. See **Exhibits A** and **B** hereto. We understand that the second diploma (i.e., Exhibit B) was produced along with other CSU documents, under cover of a letter dated September 22, 2022 (**Exhibit C**), from Mr. Caleb Westberg (CSU's Registrar) to Mr. Matthew J. Kowals (a Chicago lawyer representing Mr. Enahoro-Ebah, a party in the Nigerian Proceedings).

We respectfully request CSU's assistance in answering questions about apparent discrepancies concerning the two documents purporting to be Mr. Tinubu's 1979 diploma from CSU, as well as questions we have concerning Mr. Westberg's letter dated September 22, 2022, to Mr. Kowals. We prefer to proceed on an amicable and cooperative basis, without the need for subpoenas or other legal processes. We are hopeful that CSU will also want to clarify issues concerning documents bearing its name, but whose authenticity is now contested in litigation concerning the integrity of Nigeria's presidential elections.



Jason L. Carter, Esq.  
July 10, 2023  
Page 2

Our questions concerning the documents are set forth below. Once you have reviewed this letter, we ask that you or one of your colleagues promptly contact us to discuss them further.

**1. The Diploma dated June 22, 1979 (Exhibit A)**

We understand that that Mr. Tinubu submitted the CSU diploma dated June 22, 1979 (the “**June 22 Diploma**”) to Nigeria’s Independent National Electoral Commission, on or about June 17, 2022.

As you will see, the June 22 Diploma represented in Exhibit A is significantly different from the CSU Diploma represented in Exhibit B, which is dated June 27, 1979 (the “**June 27 Diploma**”). The font and seal used for the June 22 Diploma are different from those on the June 27 Diploma. The opening sentence on the June 22 Diploma is grammatically incorrect:

On the recommendation of the faculty of the College of  
Business and under the authority of the Board of Trustees  
of Chicago State University has conferred upon Bola A.  
Tinbu the Degree of Bachelor of Science....

*See Exhibit A.* That error is fixed in the June 27 Diploma, for which the opening sentence states:

On the recommendation of the faculty of the College of  
Business and under the authority of the Board of Trustees,  
Chicago State University has conferred upon Bola A.  
Tinubu the degree of Bachelor of Science....

*See Exhibit B.*

There are three signatures on the June 22 Diploma. One of them is for Dr. Elnora Daniel, as President of the University. However, a public records search demonstrates that Dr. Daniel did not join CSU until 1998—some 19 years after the date of the diploma. We are unable to make out the other two signatures on the June 22 Diploma.

Given these discrepancies, we have the following questions about the June 22 Diploma. Does CSU have any record of having provided the June 22 Diploma (as represented in Exhibit A) to Mr. Tinubu (or anyone else)? Does CSU consider Exhibit A to be a true and correct copy of an authentic CSU diploma issued to Mr. Tinubu? If the answer to the second question is yes, can CSU help us to understand why Dr. Daniel appears to be one of the signatories when she did not join CSU until 1998? Can CSU identify the two signatures that appear on the June 22 Diploma in addition to that of Dr. Daniel?



Jason L. Carter, Esq.  
July 10, 2023  
Page 3

**2. The June 27 Diploma (Exhibit B)**

According to documents submitted in the Nigerian proceedings, Mr. Westberg provided a copy of the June 27 Diploma with his letter to Mr. Kowals dated September 22, 2022. As noted above, the June 27 Diploma is entirely different in appearance from the June 22 Diploma. There are several other puzzling aspects to the June 27 Diploma.

*First*, unlike the June 22 Diploma, which has three signatures, the June 27 Diploma has two signatures. It appears to be signed by Dr. Elnora Daniel, as President of the University, and by Dr. Niva Lubin, M.D., as Chairperson of the Board of Trustees. As stated above, Dr. Daniel did not join the University until 1998. Similarly, Dr. Niva Lubin (who is always referred to in public records as Dr. Niva Lubin-Johnson) was not appointed to the Board of Trustees at CSU until 1996—some 17 years after the date of the diploma.

*Second*, according to Mr. Westberg's letter dated 22 September 2022, Mr. Tinubu received his degree on June 22, 1979. *See* Exhibit C. That date is consistent with the diploma represented by Exhibit A. But it is inconsistent with the diploma represented by Exhibit B—which, again, is said to have accompanied Mr. Westberg's letter.

In light of these discrepancies, we have the following questions. Did CSU in fact provide the copy of the June 27 Diploma, as represented in Exhibit B, to Mr. Kowals (or anyone else)? Does CSU consider Exhibit B to be a true and correct copy of an authentic CSU diploma issued to Mr. Tinubu? If the answer to the second question is yes, can CSU help us to understand why it is dated June 27, 1979, instead of June 22, 1979, and why Dr. Lubin and Dr. Daniel appear to be signatories when they did not join CSU until the late 1990s?

**3. Letter dated September 22, 2022 (Exhibit C)**

According to records in the Nigerian proceedings, Mr. Westberg's letter dated September 22, 2022, accompanied the June 27 Diploma (along with other CSU records described in the letter).

Can CSU advise us whether Exhibit C is a true and correct copy of a letter sent by Mr. Westberg to Mr. Kowal on or about September 22, 2022? If so, did Mr. Westberg also provide Mr. Kowal with the documents described therein, including a copy of the June 27 Diploma as represented in Exhibit B? Would CSU be willing to provide us with copies of those same documents?

Alternatively, if CSU did not issue or provide the diplomas represented by either Exhibit A or Exhibit B—and/or if CSU does not consider either Exhibit A or Exhibit B to represent authentic CSU diplomas—please so advise us.



Jason L. Carter, Esq.  
July 10, 2023  
Page 4

As stated above, we prefer to obtain CSU's assistance with these questions on an informal basis. We also hope that CSU will share our desire to clarify these important issues, to help ensure the integrity of Nigeria's presidential elections and related legal processes. At the same time, it is critically important that we get to the bottom of these matters as soon as possible. Accordingly, please let us know at your earliest convenience if you or one of your colleagues at CSU is available and willing to discuss these matters with us in a phone or video conference early this week. We would also be happy to arrange for one or more of our colleagues in our Chicago office to meet with you in person.

Very truly yours,

A handwritten signature in blue ink, which appears to read "Alexandre de Gramont". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alexandre de Gramont  
Partner  
Dechert LLP

cc: Andrew J. Levander, Esq.  
Angela M. Liu, Esq.

# EXHIBIT A

# CHICAGO STATE UNIVERSITY

On the recommendation of the faculty of the  
College of Business

and under the authority of the Board of Trustees  
of Chicago State University has conferred upon

**Bala A. Timoth**

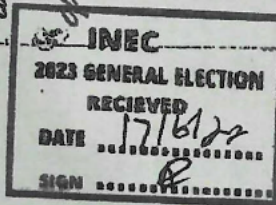
the degree of  
**Bachelor of Science**  
Business and Administration

With Honors

with all the rights, honors, and privileges pertaining thereto.

In testimony whereof the undersigned officers of Chicago State University have affixed their  
signatures together with the Seal of the University in witness thereof this Diploma is granted

this twenty-second day of June, A. D. 1979.



HIGH COURT OF FCT	
NAME	2012 11/11
RANK	11/11
SIGN	
DATE	



For the Board of Trustees

*William J. Kenwood*  
Chairman of the Board

For the University

*John D. ...*

*Robert A. Conley*

# EXHIBIT B

# Chicago State University

On the recommendation of the faculty of the  
College of Business

and under the authority of the Board of Trustees, Chicago State University has conferred upon

**Mola A. Timbu**

the degree of

**Bachelor of Science**  
Business and Administration  
With Honors

with all the rights, honors and privileges pertaining thereto.

In testimony whereof, the undersigned officers of Chicago State University have affixed their signatures together with the seal of the University. In witness thereof, this diploma is granted

this twenty-seventh day of June, A.D. 1979.



*Wray Lubin, M.D.*  
Chairman, Board of Trustees

*Ethel D. Dail*  
President of the University

HIGH COURT OF FCT	
CTC	
NAME	Wray Lubin, M.D.
RANK	Chairman
SIGN	[Signature]
DATE	6/27/79

# EXHIBIT C



CHICAGO STATE  
UNIVERSITY

September 22, 2022

To Matthew J. Kowals:

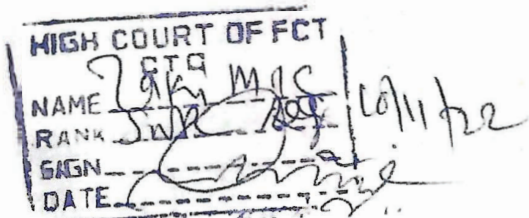
Please be advised that Bola A. Tinubu attended Chicago State University from August 1977 - June 1979. He was awarded a Bachelor of Science degree in Business Administration with Honors on June 22, 1979.

The enclosed documentation is all the records we have for Bola A. Tinubu. We do not have a record of any documentation for a: passport, visa, social security card, or driver's license. Additionally, we do not have a record of how tuition was paid during his time of attendance.

Respectfully,

Caleb Westberg  
Registrar  
Office of Records and Registration  
9501 South King Drive - ADM 128  
Chicago, IL 60628  
773-995-2517 (phone)  
773-995-3618 (fax)  
[CSU-Registrar@csu.edu](mailto:CSU-Registrar@csu.edu)

9501 S. King Drive  
Chicago, IL 60628  
773.995.2000



csu.edu